

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

|                           |   |                            |
|---------------------------|---|----------------------------|
| POWER INVESTMENTS, LLC,   | ) |                            |
|                           | ) |                            |
| Plaintiff/Counterclaim    | ) |                            |
| Defendant,                | ) |                            |
|                           | ) |                            |
| vs.                       | ) | Case No. 4:21-cv-01022-SEP |
|                           | ) |                            |
| CARDINALS PREFERRED, LLC, | ) |                            |
|                           | ) |                            |
| Defendant/Counterclaim    | ) |                            |
| Plaintiff.                | ) |                            |
|                           | ) |                            |

**JOINT MOTION FOR LEAVE TO FILE ADDITIONAL PAGES**

WHEREAS, on June 2, 2022, the Court issued the Second Amended Case Management Order pursuant to which the Court ordered, among other things, that any motions for summary judgment must be filed no later than July 7, 2022 (the “Opening Memorandum”), any responses to said motions shall be filed no later than July 28, 2022 (the “Opposition”), and any replies shall be filed no later than August 8, 2022 (the “Reply”). Doc. No. 134.

WHEREAS, both Plaintiff/Counterclaim Defendant Power Investments, LLC (“Power”) and Defendant/Counterclaim Plaintiff Cardinals Preferred, LLC (“Cardinals”) (collectively, the “Parties”) intend to move for summary judgment on or before July 7, 2022.

WHEREAS, the Local Rules provide “[n]o party shall file any motion, memorandum, or brief which exceeds fifteen (15) numbered pages, exclusive of the Table of Contents, Table of Authorities, signature page, and attachments, without leave of Court.” E.D. Mo. L.R. 4.01.

WHEREAS, the Parties have conferred and agree that both Cardinals and Power will require more than fifteen (15) pages to adequately and thoroughly address the issues before the Court in their summary judgment briefs because of, among other things, the amount of discovery

in the record and the complex legal issues in this case. The motions for summary judgment are expected to address all Counts of Power's Initial Complaint and Cardinals' counterclaims and the additional pages will provide necessary background and legal argument for each of those counts.

COME NOW, the Parties, through undersigned counsel, and subject to the approval of the Court, jointly move for leave to file additional pages with respect to the Parties' briefing in support of their respective motions for summary judgment as follows:

1. Each Party shall be permitted to file an Opening Memorandum not to exceed forty-five (45) numbered pages, exclusive of the Table of Contents, Table of Authorities, signature page, and attachments;
2. Each Party shall be permitted to file an Opposition not to exceed forty-five (45) numbered pages, exclusive of the Table of Contents, Table of Authorities, signature page, and attachments; and
3. Each Party shall be permitted to file a Reply not to exceed twenty-one (21) numbered pages, exclusive of the Table of Contents, Table of Authorities, signature page, and attachments.

Dated: July 6 2022

Respectfully submitted,

**DENTONS US LLP**

By: /s/ Stephen J. O'Brien  
Stephen J. O'Brien, #43977MO  
One Metropolitan Square, Suite 3000  
St. Louis, Missouri 63102  
Tel.: (314) 241-1800  
Fax: (314) 259-5959  
stephen.obrien@dentons.com

**REED SMITH LLP**

By: /s/ Wayne C. Stansfield  
Joseph J. Tusso (admitted pro hac vice)  
Wayne C. Stansfield (admitted pro hac vice)  
Nicholas R. Rodriguez (admitted pro hac vice)  
Three Logan Square  
1717 Arch Street, Suite 3100  
Philadelphia, Pennsylvania 19103  
Tel.: (215) 851-8100  
Fax: (215) 851-1420  
jtuso@reedsmith.com  
wstansfield@reedsmith.com  
nrodriguez@reedsmith.com

*Counsel for Cardinals Preferred LLC*

**DOWD BENNETT LLP**

By: /s/ James F. Bennett (w/ consent)  
James F. Bennett, #46826MO  
Edward L. Dowd, Jr., #28785MO  
Jeffrey R. Hoops, #69813MO  
Milton P. Wilkins, #65278MO  
7733 Forsyth Blvd., Suite 1900  
St. Louis, Missouri 63105  
Tel.: (314) 889-7300  
Fax: (314) 863-2111  
jbennett@dowdbennett.com  
edowd@dowdbennett.com  
jhoops@dowdbennett.com  
mwilkins@dowdbennett.com

*Counsel for Power Investments LLC*

IT IS SO ORDERED this \_\_\_\_\_ day of July, 2022.

---

SARAH E. PITLYK  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing was electronically filed on July 6, 2022 with the United States District Court for the Eastern District of Missouri using the CM/ECF system which will send notification of such filing to all parties requesting electronic notice.

/s/ Wayne C. Stansfield

Wayne C. Stansfield